Case 2:13-cv-01579-GMN-CWH Document 1 Filed 08/30/13 Page 1 of 57 CAMPBELL & WILLIAMS 1 J. COLBY WILLIAMS, ESO. (5549) jcw@campbellandwilliams.com PHILIP R. ERWIN, ESQ. (11563) pre@campbellandwilliams.com 3 700 South Seventh Street 4 Las Vegas, Nevada 89101 Telephone: (702) 382-5222 5 Facsimile: (702) 382-0540 6 LEVINE SULLIVAN KOCH & SCHULZ, LLP SETH D. BERLIN (pro hac vice to be filed) 7 sberlin@lskslaw.com 8 1899 L Street, NW, Suite 200 Washington, D.C. 20036 9 Telephone: (202) 508-1122 Facsimile: (202) 861-9888 10 Attorneys for Defendant 11 Gawker Media, LLC 12 UNITED STATES DISTRICT COURT 13 DISTRICT OF NEVADA 14 HANNAH CORNETT, an individual, 15 Case No. 16 Plaintiff, 17 NOTICE OF REMOVAL VS. 18 GAWKER MEDIA, LLC, a limited liability 19 company; A.J. DAULERIO, an individual, 20 Defendant. TO THE CLERK IN THE ABOVE-ENTITLED COURT: 22

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www.campbellandwilliams.com

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OO SOUTH SEVENTH STREET,

PLEASE TAKE NOTICE THAT Defendant GAWKER MEDIA, LLC ("Gawker"), pursuant to 28 U.S.C. § 1446(a), hereby removes the action entitled Cornett v. Gawker Media, LLC et al., Case No. A-13-686333-C, from Department I of the Eighth Judicial District Court of the State of Nevada for Clark County to the United States District Court for the District of Nevada. The removal of this case is based upon the following grounds:

1. Pursuant to 28 U.S.C. § 1441, a civil action brought in state court may be removed
to the United States District Court embracing the place where the state action is pending provided
there is original jurisdiction. Here, removal of this case is appropriate because this Court has
original jurisdiction based on diversity of citizenship under 28 U.S.C. § 1332.

- 2. Plaintiff Hannah Cornett alleges that she is a citizen of the state of California. *See* Exhibit "A," Civil Cover Sheet and Complaint, ¶ 10. Defendant Gawker Media, LLC is a Delaware limited liability company that maintains its principal place of business in New York. *See* Exhibit "A," Civil Cover Sheet and Complaint, ¶ 11. As such, the parties' diversity of citizenship is not in dispute.¹
- 3. The amount in controversy exceeds \$75,000 as Plaintiff Cornett requests general and special damages in excess of \$50,000 for each of the three (3) causes of action alleged in the Complaint. See Exhibit "A," Civil Cover Sheet and Complaint, Prayer for Relief. Plaintiff Cornett likewise seeks punitive and exemplary damages on her first cause of action for Defamation and her second cause of action for "False Light Invasion of Privacy." The amount in controversy, therefore, exceeds \$75,000.
- 4. Defendant Gawker was served with the Complaint on August 2, 2013. Accordingly, this Notice is timely as required by 28 U.S.C. § 1446(a).
- 5. Defendant Gawker shall serve the instant Notice on Plaintiff and will file a Notice of Filing of Removal with the Eighth Judicial District Court of the State of Nevada.
 - 6. Gawker provides this Court with the following documents from the state court:
 - Civil Cover Sheet and Complaint, attached hereto as Exhibit "A."
 - Initial Appearance Fee Disclosure, attached hereto as Exhibit "B."

Defendant A.J. Daulerio, who is alleged to be a citizen of New York, has not been served with the Complaint at the time of filing and, thus, does not need to join this Notice of Removal. See Destfino v. Reiswig, 630 F.3d 952, 957 (9th Cir. 2011).

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•	Summons,	attached	hereto	as	Exhibit	"C	.,
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- Proof of Service on Gawker Media, LLC, attached hereto as Exhibit "D."
- Notice of Posting of Non-Resident Cost Bond, attached hereto as Exhibit "E."

DATED this 30th day of August, 2013.

CAMPBELL & WILLIAMS

By /s/ J. Colby Williams J. COLBY WILLIAMS, ESQ. (5549) PHILIP R. ERWIN, ESO. (11563) 700 South Seventh Street Las Vegas, Nevada 89101 Telephone: (702) 382-5222 Facsimile: (702) 382-0540

LEVINE SULLIVAN KOCH & SCHULZ, LLP SETH D. BERLIN (pro hac vice to be filed) 1899 L Street, NW, Suite 200 Washington, D.C. 20036 Telephone: (202) 508-1122

Facsimile: (202) 861-9888

Attorneys for Defendant Gawker Media, LLC

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I certify that I am an employee of Campbell & Williams and that I did, on the 30th day of
August, 2013, serve upon the attorneys in this action a copy of the foregoing NOTICE OF
REMOVAL in a sealed envelope, to the following counsel and that postage was fully prepaid
thereon:
Airene Williamson, Esq. Williamson Law Office, PLLC 1060 Wigwam Parkway Henderson, Nevada 89074

Stephen M. Kernan The Kernan Law Firm 9663 Santa Monica Blvd., #450 Beverly Hills, California 90210

Attorneys for Plaintiff

/s/ Lucinda Martinez
An Employee of Campbell & Williams

EXHIBIT A

EXHIBIT A

EHIBIT A

CIVIL COVER SHEET A- 13-686333- C

County, Nevada

Case No. _____

(Assigned by Clerk's Office)					
I. Party Information					
Plaintiff(s) (name/address/phone): C/O 1060 Wigwam Parkway Henderson, Nevada 89074		Gawker Media, LLC, a limited Defendant(s) (name/address/phone): liability company; A.J. Daulerio, an individual and Does 1 through 20, inclusive			
II. Nature of Controversy (Please che applicable subcategory, if appropriate)	eck applicable bold	category and	Arbitration Requested		
	Civi	il Cases			
Real Property		To	orts		
☐ Landlord/Tenant ☐ Unlawful Detainer ☐ Title to Property ☐ Foreclosure ☐ Liens	☐ Negligence – Au ☐ Negligence – Me ☐ Negligence – Pre	dical/Dental emises Liability Slip/Fall)	☐ Product Liability ☐ Product Liability/Motor Vehicle ☐ Other Torts/Product Liability ☐ Intentional Misconduct ☐ Torts/Defamation (Libel/Slander) ☐ Interfere with Contract Rights		
☐ Quiet Title ☐ Specific Performance ☐ Condemnation/Eminent Domain ☐ Other Real Property ☐ Partition ☐ Planning/Zoning	☐ Negligence — Other		☐ Employment Torts (Wrongful termination) ☐ Other Torts ☐ Anti-trust ☐ Fraud/Misrepresentation ☐ Insurance ☐ Legal Tort ☐ Unfair Competition		
Probate		Other Civil	Filing Types		
Estimated Estate Value: Summary Administration General Administration Special Administration Set Aside Estates Trust/Conservatorships Individual Trustee Corporate Trustee Other Probate	Insurance Commerci Other Con Collection Employme Guarantee Sale Conn Uniform C Civil Pefition fo Foreclosure	ract c Construction Carrier al Instrument tracts/Acct/Judgment of Actions ent Contract ract Commercial Code r Judicial Review Mediation inistrative Law	Appeal from Lower Court (also check applicable civil case box) Transfer from Justice Court Justice Court Civil Appeal Civil Writ Other Special Proceeding Other Civil Filing Compromise of Minor's Claim Conversion of Property Damage to Property Employment Security Enforcement of Judgment Foreign Judgment — Civil Other Personal Property Recovery of Property		
	☐ Worker's C	t of Motor Vehicles Compensation Appeal	Other Civil Matters		
III. Business Court Requested (Ple	ase check applicable c	ategory; for Clark or Wash			
☐ NRS Chapters 78-88 ☐ Commodities (NRS 90) ☐ Securities (NRS 90)	☐ Investments (NI☐ Deceptive Trade☐ Trademarks (NI☐	Practices (NRS 598)	☐ Enhanced Case Mgmt/Business ☐ Other Business Court Matters		
1 1 2013		Signature o	f initiating pacty or/representative		
U (Date	See other side for family-related case filings.				

Electronically Filed 08/01/2013 03:24:09 PM COMP 1 Airene Williamson, Esq. Nevada State Bar # 11594 CLERK OF THE COURT 2 Williamson Law Office, PLLC 1060 Wigwam Parkway 3 Henderson, Nevada 89074 Telephone: (702) 823-3311 Facsimile: (702) 309-1085 4 E-mail: awilliamson@wlawoffice.com 5 Of Counsel 6 (Pro Hac Vice Application To Be Filed) 7 Stephen M. Kernan The Kernan Law Firm 8 9663 Santa Monica Blvd., 450 Beverly Hills, California 90210 9 Telephone: (310) 490-9777 10 Attorneys for Plaintiff HANNÁH CORNETT 11 12 DISTRICT COURT OF NEVADA, EIGHTH JUDICIAL DISTRICT 13 FOR CLARK COUNTY 14 15 A- 13- 686333- C HANNAH CORNETT, an individual, 16 CASE NO. Plaintiff, 17 DEPT NO. 18 ٧. **COMPLAINT FOR:** 19 GAWKER MEDIA, LLC, a limited liability 1. DEFAMATION company; A.J. DAULERIO, an individual; and 20 2. FALSE LIGHT INVASION OF DOES 1 through 20, inclusive, **PRIVACY** 21 Defendants. 3. NEGLIGENT INTERFERENCE 22 WITH PROSECTIVE ECONOMIC ADVANTAGE 23 **Arbitration Exemption Claimed** 24 (Declaratory Relief/Equitable Relief/Extraordinary Relief) 25 26 27 Plaintiff HANNAH CORNETT ("Plaintiff" or "Ms. Cornett"), as and for her Complaint 28

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against Defendants GAWKER MEDIA, LLC ("Gawker"), A.J. DAULERIO ("Daulerio") and DOES 1 through 20 inclusive (collectively, "Defendants"), alleges as follows:

INTRODUCTION & FACTUAL BACKGROUND

- This action exposes the continuing demise of journalistic integrity as more and more 1. online publications, purporting to be reputable news outlets, race to be the first to post online sensational and inflammatory articles without research and with total disregard for the truth. Some reporters and publications, in a rush to "scoop" the story, team up with and rely upon highly questionable "sources" without any actual investigation. Combined with an unscrupulous, dishonest "source" with an ax to grind and you have the perfect poison. So it is here.
- Few publications better exemplify the demise of journalistic integrity in America than 2. Gawker. Through its publication, Deadspin.com, Gawker facilitated a series of fraudulent articles written by Gawker's editor-in-chief, defendant A.J. Daulerio, in an attempt to wreak havoc on Ms. Cornett's personal and professional life. The articles, published on September 15, September 16, September 20, and September 23, 2011, are absurdly grouped under the title, "The Surfer Grifter" (hereinafter the "Articles"). These articles, falsely portray Ms. Cornett as a "grifter," that is, someone who commits larceny through trickery.
- In actual fact, Ms. Cornett committed no crimes, and certainly did not commit larceny, and Defendants fabricated that Ms. Cornett committed a crime, all without any investigation regarding whether a crime was even committed.
- Compounding its insults and injuries to Cornett, Defendants then falsely reported that Ms. Cornett lied about her professional accomplishments.
- 5. These fabrications and malicious acts took place in an online feature article posted on September 15, 2011, titled The Surfer Grifter: The Weird Tale of Hannah Cornett And Her \$20K Vegas Hotel Bill (the "Story"), a true copy of which is attached hereto as Exhibit "A" and incorporated herein.
- Corentt later determined that Gawker had abused its power as a "media" outlet, б. because A.J. Daulerio, the author of these articles, was actually a friend of Alesi, and Daulerio wrote the false and defamatory articles about Cornett solely to help his friend Alesi. Specifically, Alesi

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wanted to pressure Cornett to pay Alesi's hotel bill, and the Articles written for that nefarious purpose. Both Alesi and the Defendants knew that Alesi was fully responsible for the hotel bill in question, but they believed that, through the publication of the defamatory Articles, they could exert undue pressure on Cornett to force her to pay a bill that she did not owe.

- On September 15, September 16, September 20, and September 23, 2011, 7. Gawker.com published Articles accusing Ms. Cornett, explicitly and/or implicitly, of:
 - Committing criminal conduct as a "grifter" by committing larceny; a.
 - Claiming that Cornett had fabricated her career as an athlete; for example, b. Defendant stated that Ms. Cornett:
 - i. Did not receive 1st place in the 2008 Cleveland Triathlon, when in fact she did;
 - ii. Did not receive 3rd place in the Redondo Beach Triathlon, when in fact she did.

These false claims are hereafter referred to as the "Accusations."

CORNETT NEVER "GRIFTED" ALESI; THIS COURT ALREADY FOUND THAT CORNETT WAS NOT RESPONSIBLE FOR ANY OF ALESI'S HOTEL BILL

Alesi was never "grifted", nor was any act of larceny committed, nor was Cornett in any way legally responsible for Alesi's hotel bill. On or about July 1, 2013, Cornett prevailed in an arbitration in the case of Alesi v. Cornett, Case No. A-11-653891-C, District Court, Clark County, Nevada, a related action that was pending in this court. The finding of the arbitrator was that Cornett owed absolutely no monies to Alesi. Thus, she could not have "grifted" Alesi, because she did not owe Alesi any money.

THE COSMOPOLITAN HOTEL LAS VEGAS WITNESSES

The alleged "grifting" took place in Las Vegas, Nevada at the Cosmopolitan Hotel. 9. The percipient witnesses from the Cosmopolitan Hotel—all of whom are located in Las Vegas, Nevada—will testify there was no "grifting" and that Alesi voluntarily assumed the bill for the hotel, and that the hotel charges were largely incurred not by Cornett but another woman in the room that Alesi had a relationship with. Thus, Defendants' Articles twisted the truth, acclaiming that Cornett

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had committed a crime (grifting aka larceny). In fact, Cornett prevailed in the civil action brought by Alesi, which confirmed that Cornett engaged in no such "grifting", larceny or otherwise. Rather, the claims were fabricated by Alesi, and also the Defendants who published the false Accusations.

THE PARTIES

- 10. Plaintiff HANNAH CORNETT is an actress, athlete, and philanthropist. She presently maintains a residence in California.
- 11. Plaintiff is informed and believes, and based thereon alleges, that Defendant GAWKER MEDIA LLC is based in New York, New York and conducts business through the world. Plaintiff is informed and believes, and based thereon alleges, that Gawker owns and operates the website located at URL www.deadspin.com (the "Website") and that the Articles at issue in this action were published by Defendants on the Website, and was available to, and targeted, readers in the State of Nevada and Clark County.
- 12. Plaintiff is informed and believes, and based thereon alleges, that Defendant A.J. Daulerio is an individual located in New York, New York, was the editor in chief of Gawker and the Website, as well as a reporter and editor, and wrote and/or edited the Articles.
- Plaintiff is informed and believes, and based thereon alleges, that pursuant to Nevada Rules of Civil Procedure § 10(a) and Nuremberger Hercules-Werke GMBH v. Virostck, 107 Nev. 873, 822 P.2d 1100 (1991), the fictitiously named Defendants sued herein as Does 1 through 20, inclusive, and each of them, were in some manner responsible or legally liable for the actions, events, transactions and circumstances alleged herein. The true names and capacities of such fictitiously named Defendants, whether individual, corporate, associate, or otherwise, are presently unknown to Plaintiff and Plaintiff will seek leave of the Court to amend the Complaint to assert the true names and capacities of such fictitiously named Defendants when the same have been ascertained. For convenience, each reference to "Defendants" shall include the Doe Defendants, and each of them.
- 14. Plaintiff is informed and believes, and based thereon alleges, that Defendants, and each of them, are and were at all times herein mentioned, the agents, servants, employees or joint venturers of each of the other Defendants, and at all times herein mentioned were acting within the

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course and scope of said agency, employment, or service in furtherance of the joint venture.

FIRST CAUSE OF ACTION

Defamation

- 15. Plaintiff Cornett incorporates by reference each and every allegation of paragraphs 1 through 14, inclusive, as though fully set forth herein.
 - 16. The Articles as a whole and each of the Accusations are false.
- 17. The Articles as a whole and each of the Accusations are of and concerning Ms. Cornett, and persons who read the Articles would reasonably understand the references therein to be references to Ms. Cornett.
- 18. The Articles as a whole and each of the Accusations are defamatory and libelous on their face to Ms. Cornett and expose her to hatred, contempt, ridicule and obloquy, and/or cause her to be shunned or avoided and tend to injure her in her occupation.
- 19. Upon information and belief, Ms. Cornett alleges that the Articles as a whole and each of the Accusations were made by each of the Defendants with knowledge of their falsity or with reckless disregard for their truth or falsity.
- 20. Upon information and belief, Ms. Cornett alleges that the story as a whole and each of the Accusations were made by each of the Defendants in a grossly irresponsible manner with want of due care.
- 21. Several news publication have picked up the Articles and are running republications on their online websites. Defendants' conduct resulted in the republications, which caused and continue to cause additional and further damage to Ms. Cornett.
- 22. Ms. Cornett has been suffered harm as a direct and proximate result of Defendants' conduct, including without limitation, harm to her reputation, career, professional character and standing in the community.
- 23. Ms. Cornett has been suffered harm as a direct and proximate result of Defendants' conduct, including without limitation, harm to her reputation, career, professional character and standing in the community.

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- As a direct and proximate result of the above-described conduct by Defendants, Ms. Cornett has suffered general and special damages in an amount in excess of \$50,000.00 to be determined by proof at time of trial.
- 25. Upon information and belief, Ms. Cornett alleges that each Defendant's conduct was done with oppression, fraud and malice, and therefore, the conduct of each Defendant justifies an award of punitive and exemplary damages.
- 26. Ms. Cornett has been forced to retain an attorney due to Defendants conduct, and thus is entitled to reasonable attorney's fees pursuant to Nevada Rules of Civil Procedure § 9(g).
- 27. Upon information and belief, Ms. Cornett alleges that, unless enjoined and restrained by the Court, Defendants will republish, repeat and continue to disseminate the Articles, all to the continuing injury of Ms. Cornett; that such continued republication, repetition and dissemination of the defamatory and offensive falsehoods will cause irreparable harm to Plaintiff by damaging her reputation and adversely affecting her career, philanthropic and business efforts, as well as her personal relationships.
- 28. Upon information and belief, Ms. Cornett alleges that she lacks an adequate remedy at law insofar as damages will be very difficult to calculate for such on-going injuries. By reason of the foregoing, Ms. Cornett is entitled to permanent injunction and restraining Defendants, and each of them, and all persons acting in concert with them, from republishing, repeating, distributing or otherwise disseminating the Articles.

SECOND CAUSE OF ACTION

False Light Invasion of Privacy

- 29. Plaintiff incorporates by reference each and every allegation of paragraphs 1 through 27, inclusive, as though fully set forth herein.
- 30. The Articles as a whole and each of the Accusations were widely publicized by Defendants.
 - 31. The Articles as a whole and each of the Accusations are false.

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- The Articles as a whole and each of the Accusations are of and concerning Ms. 32. Cornett, and the persons who read the Articles would reasonably understand the references therein to be reference to Ms. Cornett.
- To the extent that all or any part of the Articles as a whole or any of the Accusations 33. are found not to be defamatory of Ms. Cornett, the Articles, and the Accusations place Ms. Cornett in a false light before the public, without right or justification.
- The Articles and Accusations were published online, and thus were communicated to 34. the public at large.
- The false light in which Ms. Cornett has been placed by Defendants' Articles and 35. Accusations would be highly offensive to reasonable persons.
- Upon information and belief, Ms. Cornett alleges that the Articles as a whole and 36. each of the Accusations were made by Defendants, and each of them, with knowledge of their falsity or with reckless disregard for their truth or falsity.
- Upon information and belief, Ms. Cornett alleges that the story as a whole and each of the Accusations were made by Defendants, and each of them, in a grossly irresponsible manner with want of due care.
- Several news publications have picked up the Articles and are running republications 38. on their online websites as well. Defendants' conduct resulted in the republications, which caused and continue to cause additional and further damage to Ms. Cornett.
- Ms. Cornett has been suffered harm as a direct and proximate result of Defendants' 39. conduct, including without limitation, harm to her reputation, career, professional character and standing in the community. Further Ms. Cornett suffered emotional distress and anguish from having her professional and personal integrity torn down.
- As a direct and proximate result of the above-described conduct by Defendants, Ms. 40. Cornett has suffered general and special damages in an amount in excess of \$50,000.00 to be determined by proof at time of trial.
- Ms. Cornett has been forced to retain an attorney due to Defendants conduct, and thus 41. is entitled to reasonable attorney's fees pursuant to Nevada Rules of Civil Procedure § 9(g).

- 42. Upon information and belief, Ms. Cornett alleges that each Defendant's conduct was done with oppression, fraud and malice, and therefore, the conduct of each Defendant justifies an award of punitive and exemplary damages.
- 43. Upon information and belief, Ms. Cornett alleges that, unless enjoined and restrained by the Court, Defendants will republish, repeat and continue to disseminate the Articles, all to the continuing injury of Ms. Cornett; that such continued republication, repetition and dissemination of the defamatory and offensive falsehoods will cause irreparable harm to Plaintiff by damaging her reputation and adversely affecting her career, philanthropic and business efforts, as well as her personal relationships.
- 44. Upon information and belief, Ms. Cornett alleges that she lacks an adequate remedy at law insofar as damages will be very difficult to calculate for such on-going injuries. By reason of the foregoing, Ms. Cornett is entitled to permanent injunction and restraining Defendants, and each of them, and all persons acting in concert with them, from republishing, repeating, distributing or otherwise disseminating the Articles.

THIRD CAUSE OF ACTION

Negligent Interference with Prospective Economic Advantage

- 45. Plaintiff incorporates by reference each and every allegation of paragraphs 1 through 43, inclusive, as though fully set forth herein.
- 46. Pursuant to the underlying facts alleged hereinabove, Defendants engaged in acts that constitute Negligent Interference with Prospective Economic Advantage
- 47. Ms. Cornett has been suffered harm as a direct and proximate result of Defendants' conduct, including without limitation, harm to her reputation, career, professional character and standing in the community. Further Ms. Cornett suffered emotional distress and anguish from having her professional and personal integrity torn down.
- 48. As a direct and proximate result of the above-described conduct by Defendants, Ms. Cornett has suffered general and special damages in an amount in excess of \$50,000.00 to be determined by proof at time of trial.

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- Ms. Cornett has been forced to retain an attorney due to Defendants conduct, and thus 49. is entitled to reasonable attorney's fees pursuant to Nevada Rules of Civil Procedure § 9(g).
- Upon information and belief, Ms. Cornett alleges that, unless enjoined and restrained 50. by the Court, Defendants will republish, repeat and continue to disseminate the Articles, all to the continuing injury of Ms. Cornett; that such continued republication, repetition and dissemination of the defamatory and offensive falsehoods will cause irreparable harm to Plaintiff by damaging her reputation and adversely affecting her career, philanthropic and business efforts, as well as her personal relationships.
- Upon information and belief, Ms. Cornett alleges that she lacks an adequate remedy 51. at law insofar as damages will be very difficult to calculate for such on-going injuries. By reason of the foregoing, Ms. Cornett is entitled to permanent injunction and restraining Defendants, and each of them, and all persons acting in concert with them, from republishing, repeating, distributing or otherwise disseminating the Articles.

PRAYER FOR RELIEF

WHEREFORE Plaintiff prays for judgment against Defendants as follows:

ON THE FIRST CAUSE OF ACTION:

- 1. For compensatory damages in excess of \$50,000.00;
- For punitive and exemplary damages in an amount appropriate to punish Defendants 2: and deter others from engaging in similar misconduct;
 - For a permanent injunction; 3.
 - For a printed retraction and apology; 4.

ON THE SECOND CAUSE OF ACTION:

- For compensatory damages in excess of \$50,000.00; 5.
- For punitive and exemplary damages in an amount appropriate to punish Defendants 6. and deter others from engaging in similar misconduct;
 - For a permanent injunction; 7.
 - 8. For a printed retraction and apology;

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- 9. For compensatory damages in excess of \$50,000.00;
- 10. For a permanent injunction;
- For a printed retraction and apology; 11.

ON ALL CAUSES OF ACTION:

- For pre-judgment interest and post-judgment interest as against all Defendants, 12. according to law; and
 - For any other and further relief as the Court deems just and proper. 13.

DATE: August 1, 2013

LAW OFFICE, PLLC WILLIAMSON

Airene/Williamson

Attorneys for HANNAH CORNETT



The Surfer Grifter: The Weird Tale Of Hannah Cornett And Her \$20K Vegas Hotel Bill (UPDATE)

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The name on the hotel room at the Cosmopolitan in Las Vegas was Hanna Cornett. Sometimes she goes by Hannah, with two H's. Her Wikipedia page describes her as a "professional actor, surier, and model." Her age is usually given as 29, but she's two years older than that. According to some of her online CVs, she's also an accomplished triathlete, an executive producer, and a humanitarian of sorts. Recently, US Weekly caught up with her at a red carpet charity event where she told the magazine she had reunited with an old flame, Entourage star Adrian Grenier:

The second time around, we are kind of starting to talk about [marriage and] whether or not it would work out. I'm kind of like ready to go. Ready with like the right guy at the right time. A tropical wedding!

If Grenier and Cornett have dated, the Bauer-Griffin celebrity photo archive has no pictures of them together, either the first time around or the second. That's not the only shortege of evidence in Cornett's biography. Some of the details above are a mishmash of embellishments and flat-out ununtits floated by Cornett throughout her career. Aside for the US interview, Cornett herself has been hard to find lately.

Cosmopolitan Hotel in Las Vegas this past May.

Deadspin was first contacted about Cornett by the owner of the credit card, who we're going to call Dave, which is not his real name. Dave lives in New York City and has a successful business career. He reached out to us because Cornett had fold him she was a pro surfer—more on that in a bit—and he hoped that publicizing the exorbitant charges to sports readers might help him track Cornett down and encourage her to pay the bill.

Dave has irred to contact Cornett by phone and email, but she's not responded. Making the situation more awkward is the fact that Dave had barely known her before he invited her to join him in Vegas for a weekend.

They had met at the SL Lounge in New York's Mestpacking District. They hang out that might, and Corneil regaled Dave with stories about her surling accomplishing its and upcoming tournaments she was participating in. She told him about how she had done her own stants for the movie Sorii Surfer.

"She seemed cool, we'd hit it off," Dave said. They communicated through text messages and Facebook exchanges soon after that. It was flirty, but friendly and Dave thought be'd found himself a new hangout partner for spontaneous adventures. "She said she'd never bean to Vegas before and I happened to be going soon for a conference and I invited her along," Dave said. Cornett was up for the trip.

He booked the flight. He booked the botel rooms. "Separate," he said. Because it was the gentlemanly thing to do." Dave first wondered if he d picked the wrong gal to tag along on an impromptu getaway when she'd called him and asked if she could change her flight: "She asked for my credit card number and said she'd take care of it berself." he said. "I didn't feel comfortable doing that." But once they were there, he did plop-down his card for Hannah's room for incidentals.

Dave said he and Hannah hung out for a little when they both checked in on Monday. He chatted with her in her room, and a friend was there with her. She was using the minibar, First, a \$5.41 purchase for orange juice. Then some room service for \$20.44. Fine: "Incidentals!" he told us over the phone, emphatically.

"I wasn't going to complain about the small stuff;" ha said. "Even a massage wouldn't have been out of the dustion."

Soon after that initial meeting. Dave went to his conference and Cornett holed up in her room. "She said she was sick, but we were talking the whole time," he said. "I didn't think it was that hig of a deal." But what Dave didn't know is that Cornett was just beginning to add incidentals.

That first day, Cornett picked up four charges at the hotel's Salira Spa and Hammam, ranging from \$41.065 to \$354. Tuesday was just room service and the minibar, including "BRUT CHAMP" for \$30.72. On Wednesday...

Wednesday is where the invoice gets interesting. Beyond minibar charges including \$32.43 in champague plus "SMART WATE," "RED BULL" "RUSSIAN VO," "GREY GOOSE," and "ROMANCE KI"—Cornett ordered a movie (\$12.95) and ran up a few more expenses:

- * Si.066.39 at the Sabra Spa
- * \$1,838.20 at EatIDemk!
- * \$3,013.63 at Monogram, the hotel's "gift and apparel store."

She used all three places multiple times throughout her four-night stay, in addition to the hourly minibar purchases (Friday, before checkout: "YOOHOO," \$5.41) and multiple room service charges.

Days had checked out Thursday, a day before Cornett. She asked him to stay an extra night and he was okay with that because he didn't suspect anything was out of the ordinary with his card at that time. It wasn't mull be got home that he received the full bill—\$20,625.00.

According to the hotel, the Cosmopolitan's policy is that once a card has been placed on the room, they are under no obligation to let the cardholder know about any expensive purchases. Dave says that Cornett signed for all the purchases with her own name. This was his most recent correspondence with her.

On May 31, 2011, at 9:08 PM, [Redacted]<[Redacted]@grant.com> wrote:

Hanna - Attached you will find the bill for Cosmopolitan Las Vegas. I DID NOT approve any of these charges nor was I made aware that you were using the room to go on a shopping spree. This is 1st Degree Grand Larceny. I expect to be paid for all items listed on this bill or I am turning this matter over to the Las Vegas Police Department. The Cosmopolitan has made me aware that all slope have video manitoring, so if it is not you or Carlie Culler please let me know, This is a major problem and I will be containing the police tomorrow if we do not have this resolved.

Call me at [Redacted] to discuss this matter.

From: Hannah Corneit <[redacted]@me.com> Subject: Res Guest Folio for The Cosmopolitan of Las Vegas Date: May 31, 2011 10:17:10 PM EDT To: [redacted]<fredacted]@gmail.com>

I will take care of the immediately, thank you for bringing this to my attention.

Cornett liever followed up after that. So Dave retained an attorney who fired off this letter to her email:

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Again, no response. We've tried to contact Cornett at her me come mail address and the phone number she give to David, but liave also received no response. Per one of her Facebook pages, we tried to complorate some other information about Cornett. Her manager, listed as Marcieanna Jasko of Special-trists, hasn't worked at that company for years. April Dorn of Special-trists did confirm Cornett as a client but did not send along her professional bio as we requested and would not supply any way to get in touch with her. Her publicist, listed as Michael Neaman of MNPR-LLC, appears to have dropped off the planet. And MNPR-LLC was never a business that existed, at least according to the California State Department.

On another one of her Facebook pages (which was made private in the last 24 hours), Cornett lists some of her athletic achievements:

2008 Competitions

Escapa From Alcatraz Triathlon - 4th, San Francisco, California

USAT World Championships - 4th Cancun, Mexico

MY SUMA International Triathlon - 1st Ohio

Cleveland Triathion - 1st, Ohio

BON TO THE RESERVE OF THE PARTY OF THE PARTY

Accounts peach Trustmon-3rd, California Long Beach ITU World Cup - 3rd, California Xierra South Africa - 5th, South Africa Xierra Italy - 5th, Italy

A representative from the Xterra Tour did confirm that Cornett had participated in some of their events (the Maui one, specifically) and said that she is a mathlate and "in good shape," but Xterra could not confirm where she placed. According to the results of the 2008 Cleveland Triathlon, Cornett did not finish first. According to the results of the Redondo Beach Triathlon in 2008, she did not come in 3rd. There are no results for the Long Beach ITU World Cup online.

As for her pro surfing career, she lists this:

Career

Ranked and, WSA surfing (worldwide)

That's second in the Western Surfing Association, which is an emateur or senization and not worldwide. She was not ranked on any of the WSA's lists between the years of 2008 and 2010, according to a representative from that organization. So she's not a professional surfer (or a competing amateur on that circuit) by any stretch of the imagination, even though she's listed as such in many articles and even presented herself as one on the Penn Jillette game show "Identity":



A representative from the Association of Surfing Professionals wrote in an small that no one at their organization has any information on her. Travis Ferre, editor in chief of Surfing magazine, had also never heard of Cornett. He added this: "IJ Indoine by her hometown of Cleveland, and the someoment she uses I

wouldn't bet she's made much money surfing aside from modeling with a board. I've never heard of her in any aspect, let alone surfing."

She has apparently run into a shark, once, though. A 13-footer.



But Cornett seems to have shifted away from surfing and is now focusing on acting and humanitarianism.

Her Twitter account actively promotes some of her charities including the most recent Tags4Lives red carpet event in NYC, where she was interviewed by Us about her relanded relationship with Gremer. But her idea of promotion appears to be Twiner-stalking A-listers and asking them to attend. Like this:

(\$LeaDiCaprio fellow actress/pro-surfer, my charity's daing a major event in NYC, 9/3, can we get u out? #lisaSTARthing

The Tags4Lives charity home page is here by the way, and, no, it hasn't showed up in Charity Navigator just yet

So where does this leave poor Dave? With us, it seems, hoping to track down Hannah so he can get the bill settled. But if anyone our there can tells us about the real Hannah, or has run into her—on the red carpet; paddling out for some waves, hopping a bike at a triathlou, smoothing with Adrian Gremer—and can let us know why she's been so neglectful about ponying up for her Vegas shopping spree, you'd be doing everyone a great service.

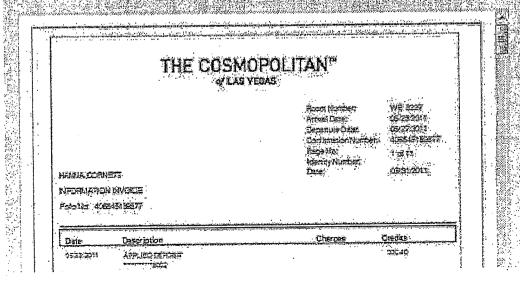
UPDATE: Soon after this story went up, Hannah Cornett deleted her Twitter account, most likely after actual professional surfer Kelly Slater became aware of our story and went all what's up-bran? on her, Since

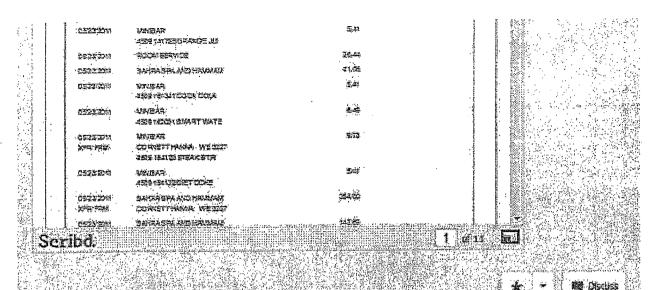
then, our pseudo-surfer has outed "Dave" as James Aless, the real identity of the card owner, on what independent for the card owner, on what independent for the card owner, on what independent for the respective formation of the story. Yet, she still forgot to enase her past Tweets below the Alesi apology because, well, this is the type of person who has a history of neglecting obvious details—especially when she's pretending to be someone she's not.



Yes, it's all bizarre and rapidly turning quite sad, but it does give a better glimpse into the mind of Cornett, who is doing what she can to salvage her fantasy world. More furnismost if necessary.

Meanwhile, you can read through her remarkable shopping habits on James Alesis Dave's card at the Cosmopolitan Hotel:





64 descessions displayed because an author is participating or following a participant

26 participants

Ô

A Pimo Named DaveR * A.J. Davietta

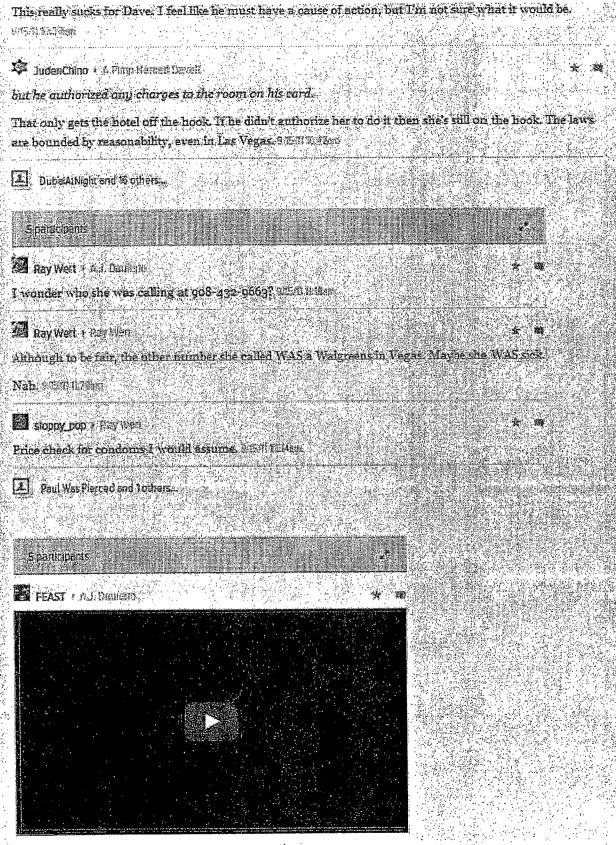
Unfortunately for Dave, I think he's up shit creek without a paddle on this one legally. He can say that the charges were "fraudulent" all he likes.. but he authorized any charges to the room on his card. That sort of ends the "fraud" discussion. Did he know that a wide variety of things beyond the minibar could be charged to his card if he left if on the room account? Yes, So there you go. He knew the risk, and took it. When she does what he has authorized her to do, even if he did not intend for her to charge so much, she's not committing fraud.

Adding insult to inputy—the probably has to file a gift tax return, too, since the gratuitous transfer is over Sigk. MeM 19.5 as

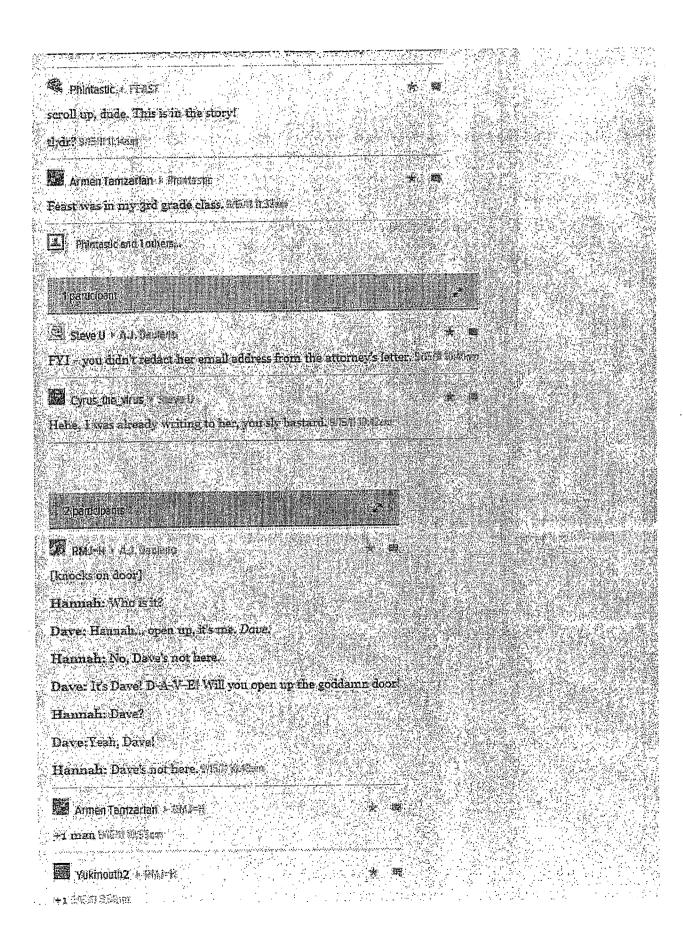
Steve U · A Final Contact Day of

Yeah, I agree. Unless the expressly promised Dave that she wouldn't spend above \$X, while knowing that, in fact, she intended to spend above \$X. Then there would be a misrepresentation on which Dave relied, which could serve as the basis for a fraud claim. But, I doubt there was ever such an express promise and, even if there was, it would come down to he-said, she-said. I would be curious to see the small exchange that the attorney mentioned, which supposedly makes it "very clear" that Dave only agreed to pay for sirfare and the hotel room.

In Dave's favor, her email of May 31 is almost an assumption of the debt, so perhaps he could proceed on those grounds.



Here the it harmered in tome NRC that ralled Thentity will be the



Hangini in A Bottle i, n.s., Dathers. 'I was fured in by the possibility of a	rusty trombone, but in th	e end. all I got was a	Hannah Cornett."
-Dave's original submission to Drunk	主体心计划程序操作之间 机氯基键		
The state of the s			ppingaragus and proposed and makes and the critical
Scotchaul - A.J. Balleto		22 (1946 57) 1 1 1 1 1 1 1 1 1	
Despite being a successful businessin	an, Dave finled in his firs	affempt as a "blow-jo	h creator 1357 1235
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Even at that price, I sure wish my	room had charged for vit	ls.	
- David Carradine 945 51 16,2890			

TO CYTIS The WILLS + A.J. Dittlette Separate rooms? C'mon Daye, it's Yegas baby! You get the surf and the turff with Maden Dezzie Does Dallas + A.L. Dalles Quick Hugh Hefner! You've got a desperate one in need of cashill is will it is ELAST JALLONINA First time with a prostitute? 905% To 655 De perminal + A.J. Casalago The chances of him gerting his money back are slim to none. If he had told her "no more charging" after finding out about the first set of charges, he would have had a stronger case. But since he let it go. I don't see how that's fraud. It's not like size made charges at places outside of the hotel. I noticed that he threatened to go to the police. Did he? I limagine they told him there was nothing they could do since she didn't steal the card. He authorized the charges. He's wasting money on his attorney. Said Estan istealiamas + incyvinas He authorized charges to the minibar, not a \$20k shopping spree. That's like saying that if someone gives his executive assistant his creek card to buy herself lunch and instead she buys a car, well, he'd authorized her to charge the card. 5 22 10 1000 newhet a weaknown Acrually it's not. All of those charges are in line with what she initially charged. She didn't use his card any differently than he intended. Most of the charges are to the minibar and sea. He should have spoken up after

the first set of charges. That money is likely lost forever, with the first



scarbity - stephily

Hanna: just come out and say something to the effect of "This guy and Thad a filing, he said go and spend whatever, wherever, I took him up on it! Now he's crying som grapes because I'm blowing him off." That'll work. In a he said/she said BF/GF situation, the fleecer usually is not found liable to the fleeces. 5700 3.5500

(1 participants)

A SKIBUMZ3Z + 51 L DAMEGO

Sorry Dave, but you thought you had a new hangout buddy? Is that what dumb sich east coasters call them nowadays?

You paid Sook for probably the worst lap dance in history. Hell for Scokin Vegas a lady of the night will let you kiss her on the mouth and she'll call you baby instead of sugar or honey! 5/15/11 15/1244

Jeb Hoge - Subunitat

Yeah, I gotta agree, you were naive, or hopeful, or just plain dumb, but Dave, you're not getting that money back. Seem presen

Speridoen 177

Just The Tippling Point 1 (2.1) (251) (b) for

The most compelling thing I got out of this story was an explicit. It wasn't going to complain about the small storif," and no comments, attributing the senance to Deanna Fave. Over a year later and, we're finally moving forward.

And about the moren who let a girl he just met in Vegas have access to his credit card - pay your hookers in cash and you won't have this problem. 2550, 1982.

japber v Justine Townspiere

Correction: He met her in NYC doughe central, the meatpacking district, and flaw her, paid her hotel room, and some +S20k of worth of hotel amenities all from a brief unlocky meeting. \$15.00 \$15.00

Tpanicipant

Laboratory - ALLUminess

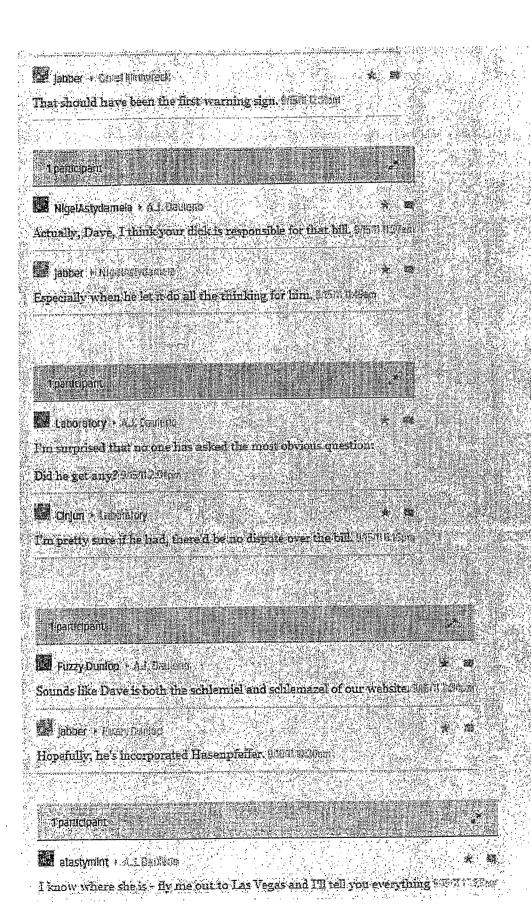
On June 29th, her Wildpedia page was deleted and replaced with the word "CROOK"

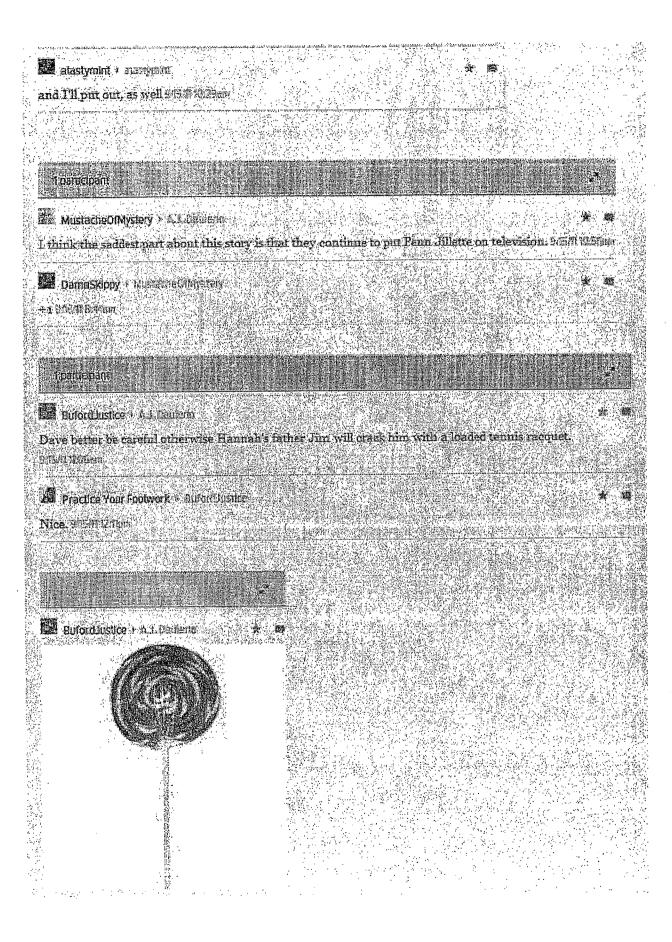
[en.wikipedia.org]

Also, I am ignorant of the inner workings of Twitter. How did the impersonation of "Dave" work! She

renemed her account, added his public and started tweeting (leaving her original "Harman Cornett" tweets behind)? She created a new "take" account for "Dave"? She backed is real account and started posting? EART DATE se labber + Laborating No, This looks like his real account [twitter.com] All she did was put an underscore between his name and took his picture from his work website. WievesZ007 + 4.1. Gentleits I'm quessing foat his successful business career means that his family has a successful business. You really cant of that studie and successful at business, Tiblication Laboratory & Milane 2007 Good-call on the family business (at least his bio says that is where he started) fwww.elliman.com] 4/6/0/022cm i panicipani robster2001 19 421 Cilulator I don't get it. Did he at least get some sex out of the deal, or didn't he? I mean, if he got taken for Sook and didn't even get one good ride out of it, what was the point, exactly? \$15.4 \$35ap M Japper + medalitit Ergo, that's why he wants his money back 50500 than 1 participant Chief Minimieck: A.L. Laufette. They had met at the SL Lounge in New York's Meatpacking District

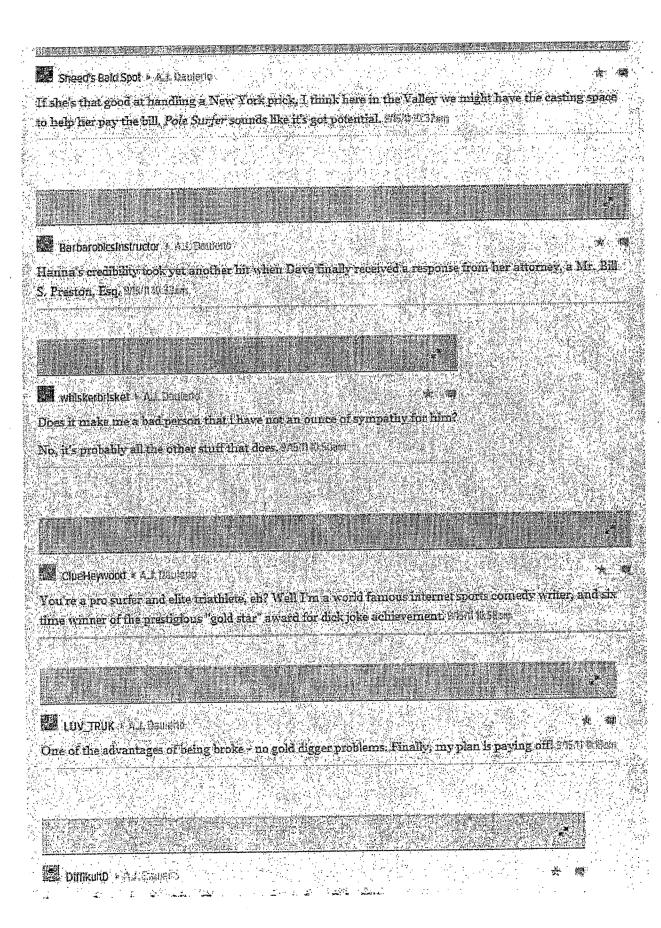
Of Dave apparently has a one-track mind. 2.15 (1985)



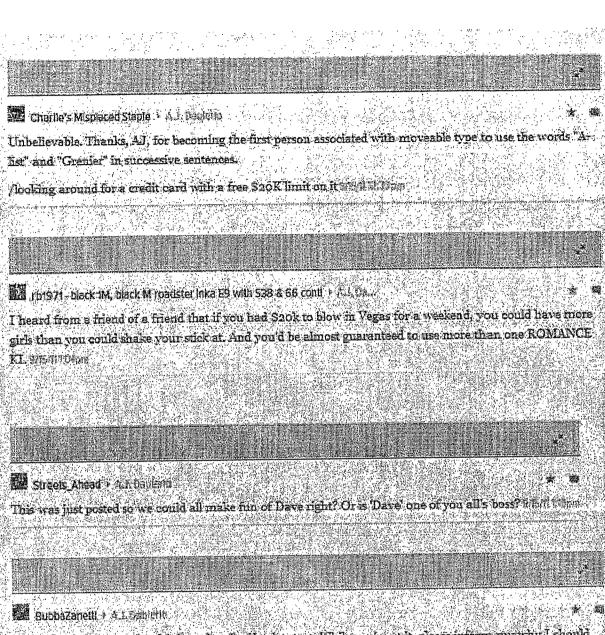


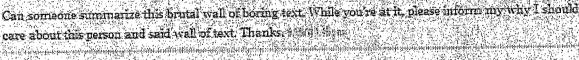
"Mhere does this leave poor Dane?" Looking like one of these. 3/27/10:2000 theholwonder + A.J. Daulessa Someone at the hotel really should have stepped up and contacted Dave when the S1000+ charges started hating, I remember being to or it years old and buying an hour of N64 time at a Le Quinta that I was staying in with my parents while they got some work done on our house. The front desk called my dad at work to make sure that he knew that I had done that (Which He didn't. He made me clean the attic to repay the dept). I get that it's Vegas and people throw cash around like it's nothing, but c mon! I was it is seen Shiwer + 4.3. Daily to "Turning guite sad"? This was sad the moment this idiot decided to write to Deadspin and show the lengths to which he would go to try to get some pussy and fall miserably. This situation definitely falls under the tough shitsky rule. It's his eard, and has responsible for the charges. End of story \mathbb{R}_{n+1} \mathbb{R}^n is 12 justin marble - 4.1.1000eros So a fake actress is possibly faking her relationship with a fake ector known for playing a fake actor? Mickolasss FALLCauteto My objective? Well I object to taking a girl to Vegas, covering her flight/room/incidentals/

food/booze/return flight and then she won't put out for youl and then she won't put out for youl



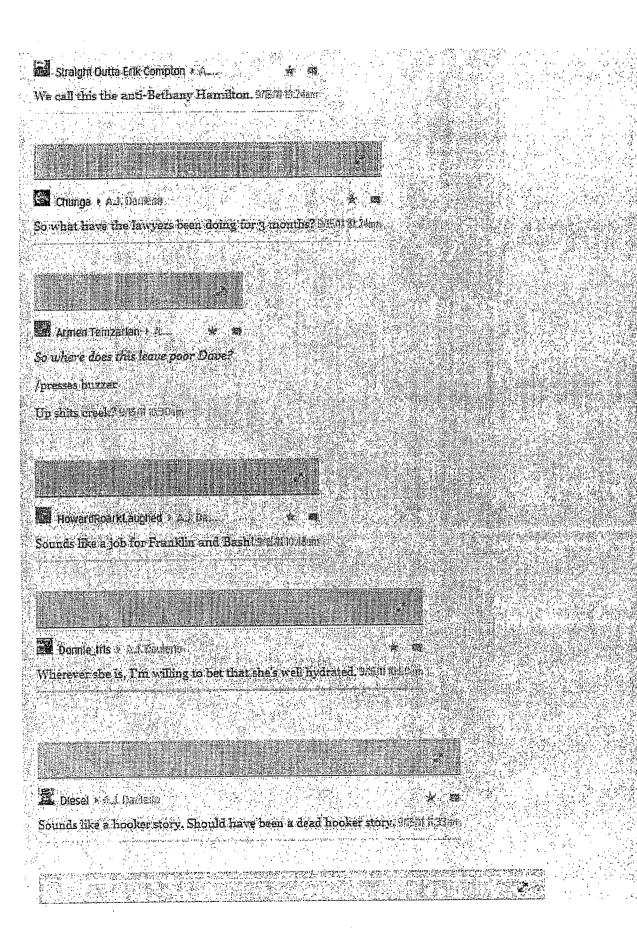
anyone else notice that Miss classy spent 57,57 ton a Pabst711 Seriously, the Cosmopolitan Hotel is stocking their mini-bers with PB-motherfucking-Roman 12 Jan Ugarles : A.L. Causerio Once you found out that she wasn't actually a pro surfer, doesn't this belong over on Gawker. They have a sideling in Ter Griffer" news that doesnit have any sports connection (except Kareem Abdul-Jabbar puns). 3/8/0/10/4st IsoldmysoultoMilhouseVanbouten It looks like she paid \$10.81 for a "Romance Kit" I wonder who she used that with 9 200 1835 an Churchomesism > A.L. Cauc to I want to know who she used the romance let on because its obvious site was screwing someone cise besides Dave State 12 Port Z Doganda Beer - A.1 Dalless Looks like the minibar markup on PBR in Vegas is pretty close to the hipster markup on it in Brooklyn. BASAL DEBINE Big Wills Style - 4.3. Dented a I find myself unreasonably angry that she would be about her Triathlon accomplishments. The Walker

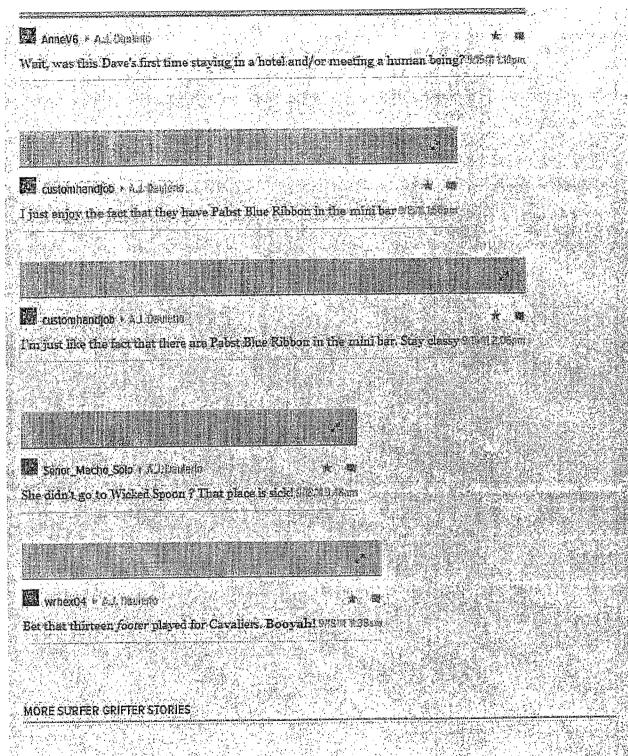






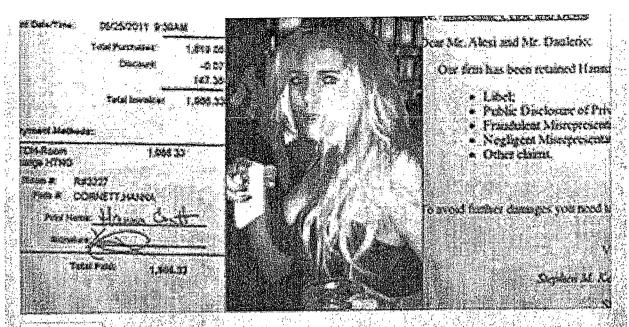
Dave, this is for you. 1 E.M. 2. I pm			
Joseph Fall Camillano Just think "Dave" now you can take another girl back	o Vegas wift the m	iles she incurred f	orwout
957(45hm			
Captain Trippis + A.L. Harthets			
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mujwa + Ad Çassan Not sine, bot i *ilinik* the phone nilmber she celled is	ponted on the bill -	I think its in the i	ir iq ormat Room
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Tyler Knew and Turk! Wendell Ate Won Too 🕞			
That confirms what I always suspected about DiCapit	o. Cumulian		





The Surfer Grifter Surfaces, Hires Attorney, Threatens Lawsuit, Etc.



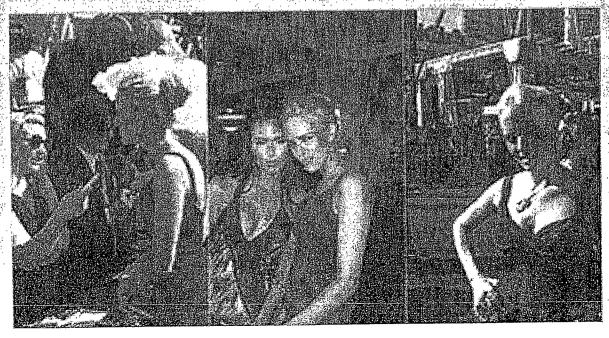


SCHUFER GRIFTER

AJ. DAULERIO

And ...exhale. Not-so pro surfer Hannah Cornett has retained the services of a Beverly Hills attorney named Michael Kernan to pull together a sloppy cease and desist letter to James Alesi (credit card sucker) and A.J. Dauleno (mel), accusing us of "libel, false claims, negligent misrepresentation" and whatever other shit...

Surfer Grifter Hits The Red Carpet At The Emmys, Possibly Responds To...





A.J. DAULERIO

The weird tale of Hannah Cornett has taken a turn for the weirder. After a brief Twitter melidown last Thursday, in which she posed as James Alesi, the New York real estate broker whold accused her of running up \$20K in charges on his credit card at a Las Vegas hotel, she fell silent. Then, on Sunday night, she posted

Hannah Cornett, The Surfer Grifter, Once Dated Tim Couch



SURTER GREATER

JACK DICKEY

Reader Jim (no, not the "Dave" from vesterday's Surfer Grifter story) calls our attention to a story in the Cleveland Plain Dealer from 2008, concerning Hannah Cornett, the very same Surfer Grifter. Apparently she worked for the Browns in the early 2000s, and while under their employ as a web designer, she dated

Captured by HMA at 13:59:57, 01-08-2013.

The Surfer Grifter: The Weird Tale Of Hannah Cornett And Her \$20K Vegas Hotel Bill (UPDATE) [http://deadspin.com/5839501/the-surfer-griffer-the-weird-tale-of-hannah-cornett-and-her-20k-regas-hotel-bill]

EXHIBIT B

EXHIBIT B

EXHIBIT B

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			Alma D. Lamm
,	IAFD		
1	Airene Williamson, Esq. Nevada State Bar #11594		CLERK OF THE COURT
2	Williamson Law Office, PLLC 1060 Wigwam Parkway		
3	Henderson, Nevada 89074 Telephone: (702) 823-3311		
4	Facsimile: (702) 309-1085		
5	E-mail: awilliamson@wlawoffice.com		
6	Of Counsel (Pro Hac Vice Application To Be Filed)		
7	Stephen M. Kernan The Kernan Law Firm		
8	9663 Santa Monica Blvd., 450		
9	Beverly Hills, California 90210 Telephone: (310) 490-9777		
10	Attorneys for Plaintiff		
11	HANNAH CORNETT		
12			
13	DISTRICT COURT OF NEVAL	DA	, EIGHTH JUDICIAL DISTRICT
14	FOR CLA	RI	K COUNTY
15	HANNAH CORNETT, an individual,)	CASE NO. 12 COCC222 G
_	Plaintiff,)	CASE NO _A - 13 - 686333 - C
16		į	DEPT NO. I
17	v.)	
18	GAWKER MEDIA, LLC, a limited liability)	
19	company; A.J. DAULERIO, an individual; and DOES 1 through 20, inclusive,)	
20	Defendants.)	
21	Defendants.)	
22)	
23		TO T	SCI ACTURE AIRS CITARTER 16)
24			SCLOSURE (NRS CHAPTER 19)
	Pursuant to NRS Chapter 19, as amende	d b	y Senate Bill 106, filing fees are
25 26	submitted for parties appearing in the above ent	itle	d action as indicated below:
27			
28		•	• • •

· 28

New Complaint Fee		1 st Appe	arance Fee
\$1530 \$520 \$299 X \$270.0	0	\$1483.00 \$4°	73.00 \$223.00
Vame:Hannah Cornett			•
			\$30
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Total of Continuation Sheet Attached			<u> </u>
COTAL REMITTED: (Required)		Total Paid	\$ <u>270.00</u>
· ·	Airene	Williamson. Esq.	
	Airene Nevad	Williamson, Esq. la State Bar # 11594 y for the Plaintiff	
(Airene Nevac Attorne	Williamson, Esq. la State Bar # 11594 y for the Plaintiff	4
	Airene Nevac Attorne	Williamson, Esq. la State Bar # 11594 y for the Plaintiff	4
	Airene Nevac Attorne	Williamson, Esq. la State Bar # 11594 y for the Plaintiff	4
	Airene Nevao Attorne	Williamson, Esq. la State Bar # 11594 y for the Plaintiff	1
	Airene Nevac Attorne	Williamson, Esq. la State Bar # 11594 y for the Plaintiff	1
	Airene Nevac	Williamson, Esq. la State Bar # 11594 y for the Plaintiff	4
	Attorne	y for the Plaintiff	1
	Attorne	Williamson, Esq. la State Bar # 11594 y for the Plaintiff	1

EXHIBIT C

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SUMM CLERK OF THE COURT Airene Williamson, Esq. Nevada State Bar #11594 Williamson Law Office, PLLC 1060 Wigwam Parkway Henderson, Nevada 89074 Telephone: (702) 823-3311 Facsimile: (702) 309-1085 E-mail: awilliamson@wlawoffice.com Of Counsel (Pro Hac Vice Application To Be Filed) Stephen M. Kernan The Kernan Law Firm 9663 Santa Monica Blvd., 450 Beverly Hills, California 90210 Telephone: (310) 490-9777 Attorneys for Plaintiff HANNÁH CORNETT DISTRICT COURT OF NEVADA, EIGHTH JUDICIAL DISTRICT FOR CLARK COUNTY HANNAH CORNETT, an individual, CASE NO. A-13-686333-C Plaintiff, DEPT NO. 1 GAWKER MEDIA, LLC, a limited liability company; A.J. DAULERIO, an individual; and) DOES 1 through 20, inclusive, Defendants. **SUMMONS** 24

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT(S): A Complaint has been filed by the Plaintiff against you for the relief set forth in the Complaint.

If you intend to defend this lawsuit, within 20 days after this Summons is served on

	1 2 3		you exclusive of the day of service, you must do the following: a. File with the clerk of this Court, whose address is shown below, a formal written response to the Counterclaim in accordance with the rules of the court. b. Serve a copy of your response upon the attorney whose name and address is shown below.
	4		Unless you respond, your default will be entered upon application of the
	5		plaintiff and this Court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property
	6		or other relief requested in the Complaint.
	7		If you intend to seek the advice of any attorney in this matter, you should do so promptly so that your response may be filed on time.
	8		
	9		The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission member and legislators, each have 45 days after service of this
	10		summons within which to file an answer to the counterclaim.
	11		
	12	Issued at the di	rection of:
	13		AUG 0 2 2013
	14	AIRÉNEWILI	IAMSON, ESQ. DATE DEPUTY CLERK DATE
	15	Nevada Bar No	n. 11594 Regional Justice Center
441	16	1060 Wigwam Henderson, NV	7 89074 Las Vegas, NV 89155
	17	Attorney for Pl	aintiff
	18	;	
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	27		and the second of the second o
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EXHIBIT D

EXHIBIT D

EXHIBIT D

Electronically Filed 08/09/2013 07:07:29 AM

Attorney or Party without Attorney: AIRENE WILLIAMSON, ESQ., #11594 WILLIAMSON LAW OFFICE, PLLC 1060 WIGWAM PARKWAY HENDERSON, NV 89074 Telephone No: 702-823-3311 FAX N				CLERK OF THE COURT
Attorney for: Plaintiff		Ref. No. or File No.:		
Insert name of Court, and Judicial District and Bra.	nch Court:	L		-
District Court Of Nevada, Eighth Judicia		County		
Plaintiff: HANNAH CORNETT, ETC.				
Defendant: GAWKER MEDIA, LLC, ETC.	ET AL.			
PROOF OF SERVICE	Hearing Date:	Time:	Dept/Div:	Case Number:
SUMMONS & COMPLAINT				A-13-686333-C

- I. At the time of service I was at least 18 years of age and not a party to this action.
- 2. I served copies of the SUMMONS; COMPLAINT; CIVIL COVER SHEET.

3. a. Party served: b. Person served: GAWKER MEDIA, LLC, A LIMITED LIABILITY COMPANY

MELANIE MCGRATH, BUSINESS FILINGS, INC., REGISTERED AGENT.

4. Address where the party was served:

108 W. 13TH STREET WILMINGTON, DE 19801

5. I served the party:

- a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive process for the party (1) on: Fri., Aug. 02, 2013 (2) at: 3:35PM
- 7. Person Who Served Papers: a. JOHN A. GARBER

Recoverable Cost Per CCP 1033.5(a)(4)(B)

d. The Fee for Service was:

e. I am: Not a Registered California Process Server

First Legal

1511 West Beverly Blvd.
Los Angeles, CA 90026
Telephone (213) 250-9111
Fax (213) 250-1197
www.firstlegalnetwork.com

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct-

Date: Tue, Aug. 06, 2013

Judicial Council Form Rule 2.150.(a)&(b) Rev January 1, 2007

PROOF OF SERVICE SUMMONS & COMPLAINT (10th A. GARBER) 3625075 .wlo.548652

EXHIBIT E

EXHIBIT E

EXHIBIT E

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	Alun D. Chum				
	CLERK OF THE COURT				
1	NPNCB Airene Williamson, Esq.				
2	Nevada State Bar #11594				
3	Williamson Law Office, PLLC 1060 Wigwam Parkway				
4	Henderson, Nevada 89074 Telephone: (702) 823-3311				
5	Facsimile: (702) 309-1085 E-mail: awilliamson@wlawoffice.com	•			
6	Of Counsel (Dro Has Viss Application To Be Filed)				
7	(Pro Hac Vice Application To Be Filed)				
8	Stephen M. Kernan The Kernan Law Firm	·			
9	9663 Santa Monica Blvd., 450 Beverly Hills, California 90210				
10	Telephone: (310) 490-9777				
11	Attorneys for Plaintiff HANNAH CORNETT				
12					
13	DISTRICT COURT OF NEVAD	A, EIGHTH JUDICIAL DISTRICT			
14	FOR CLAF	RK COUNTY			
15	HANNAH CORNETT, an individual,	CASE NO. A-13-686333-C			
16	Plaintiff,	DEPT NO. 1			
17	v.	1110. 1			
18					
19	GAWKER MEDIA, LLC, a limited liability company; A.J. DAULERIO, an individual; and) }			
20	DOES 1 through 20, inclusive,				
21	Defendants.				
22					
23					
24	NOTICE OF POSTING (OF NON-RESIDENT COST BOND			
25	Pursuant to NRS 18 130 Plaintiff hereby	posts to the Court Clerk a Bond in the amount of			
26		ct copy of which is attached hereto as Exhibit "A".			
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DATED this 8th day of August, 2013.

Airene Williamson, Esq.
Nevada State Bar # 11594
Attorney for the Plaintiff

CERTIFICATE OF MAILING

The undersigned, an employee of the law firm of WILLIAMSON LAW OFFICE, PLLC, hereby certifies that on August 9, 2013 she served a copy of the foregoing NOTICE OF POSTING OF NON-RESIDENT COST BOND by placing said copy in an envelope, postage fully prepaid, in the U.S. Mail at Las Vegas, Nevada, said envelope(s) addressed to:

Gawker Media LLC Business Filings Incorporated, Registered Agent 108 West 13th Street

Wilmington, DE 19801 Tel: (800) 981-7183

OFFICIAL RECEIPT

District Court Clerk of the Court 200 Lewis Ave, 3rd Floor Las Vegas, NV 89101

Payor Williamson Law Office PLLC Receipt No. 2013-96587-CCCLK

Transaction Date 08/9/2013

		Amount Paid
Description	 	
	 •	

On Behalf Of Cornett, Hannah A-13-686333-C

Hannah Cornett, Plaintiff(s) vs. Gawker Media LLC, Defendant(s)

SECURITY COST BOND

SECURITY COST BOND SUBTOTAL

500.00 **500.00**

PAYMENT TOTAL

500.00

Check (Ref #1048) Tendered Total Tendered Change 500.00 500.00 0.00

08/09/2013 10:30 AM Cashier Station AIKO Audit 32117577

OFFICIAL RECEIPT

296.